

Ex. 1

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-
CIO et al.,

Plaintiffs,

vs.

CHARLES EZELL, ACTING
DIRECTOR, OFFICE OF PERSONNEL
MANAGEMENT et al..

Defendants.

Civil Action No. 25-cv-10276

[AMENDED PROPOSED] TEMPORARY RESTRAINING ORDER

Upon consideration of Plaintiffs' Emergency Application for a Temporary Restraining Order ("Application"), the Memorandum of Points and Authorities and Exhibits in support thereof, any opposition, any reply thereto and any oral argument, it is hereby **ORDERED** that Plaintiffs' Motion is **GRANTED**.

Plaintiffs have satisfied the necessary elements for issuing a Temporary Restraining Order under Fed. R. P. 65(b). In particular, Plaintiffs have established that they will likely succeed on the merits of their claim under the Administrative Procedure Act that the Fork in the Road Directive is arbitrary, capricious, and not in accordance with law, that they suffer irreparable harm absent relief, and that the balance of equities and the public interest weigh in favor of a Temporary Restraining Order. It is **FURTHER ORDERED** that the February 6th Deadline for federal employees to accept the Fork in the Road Directive is stayed, and Defendants are enjoined from further soliciting resignations under the program, pending submission and resolution of Plaintiffs' upcoming motion for preliminary injunction.

It is **FURTHER ORDERED** that Defendants must, as soon as is practicable, provide written notice of this Order to all federal employees who have received the Directive and must notify the Court that they have done so within 24 hours of this Order.

IT IS SO ORDERED.

DATE: _____, 2025

TIME: _____

U.S. District Court Judge